

**From:** [Gloria Park](#)  
**To:** [Lee J. Rohn](#); [Info](#)  
**Cc:** [Simone Francis](#); [asimpson@coralbrief.com](mailto:asimpson@coralbrief.com); [Alex Kaplan](#); [Carl Beckstedt](#); [Rachel Hanna](#); [Rachel Solis](#); [Recaldo Noel](#); [Gloria Park](#)  
**Subject:** RE: Petro v. IPOS - Vitol Defendants' Deposition Letter  
**Date:** January 27, 2023 9:41:41 AM

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Attorney Rohn,

These are the dates we offered to take the depositions that we would like to take, not to present the witnesses that you requested. Further, the list we sent takes into account the dates on which Attorneys Francis and Simpson stated that they are unavailable during the last status conference with the Court. In any event, I suggest that we wait to have this meet and confer on scheduling until Attorneys Francis and Simpson can participate.

Best,  
Gloria

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**From:** Lee J. Rohn <[lee@rohnlaw.com](mailto:lee@rohnlaw.com)>  
**Sent:** Friday, January 27, 2023 8:27 AM  
**To:** Gloria Park <[GPark@susmangodfrey.com](mailto:GPark@susmangodfrey.com)>; Info <[info@rohnlaw.com](mailto:info@rohnlaw.com)>  
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**Subject:** RE: Petro v. IPOS - Vitol Defendants' Deposition Letter

EXTERNAL Email

You cant be serious? you have given only 18 dates to take all the depositions in this case and no dates in June when I plan on doing the 30 b 6 depositions. Please let me know when in the next 7 days we can meet and confer on this. this is especially unacceptable as it is you and your client that represented that all the depositions could be taken in a short period of time and then you have virtually no dates

*Lee J. Rohn*  
[lee@rohnlaw.com](mailto:lee@rohnlaw.com)

